



THE  
NH PROVIDERS  
ASSOCIATION

Representing  
Alcohol & Other Drug Service Providers  
in New Hampshire

Courtney Gray  
NH Providers Association  
10 Ferry Street, Suite 308  
Concord, NH 03301

September 16, 2016

Jennifer Kostasich, Project Officer  
Divisions of Medicaid Expansion Demonstrations  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

RE: Draft Section 1115 Demonstration Amendment  
New Hampshire Health Protection Program Premium Assistance  
Project #11-W-00298/1

Dear Ms. Kostasich,

The NH Providers Association represents substance use providers to in advancing substance use prevention, treatment, and recovery through public policy. In order to ensure clients are able to access substance use disorder treatment and other healthcare services through the New Hampshire Health Protection Program Premium Assistance (NHHPP), the NH Providers Association submits the following comments regarding the Draft Section 1115 Demonstration Amendment, hereon Amendment.

#### Waiver Comparability

The NH Providers Association encourages CMS to approve the request to waive comparability for medically frail NHHPP enrollees. This waiver allows enrollees to be subject to the same cost-sharing requirements as other Medicaid managed care enrollees and therefore increases access to services.

#### Citizenship Verification and Residency Verification

The Amendment proposes a citizen verification requirement that would require participants to prove U.S. citizenship with two forms of identification. This requirement is an undue burden for NHHPP participants. Individuals seeking substance use disorder treatment are homeless, couch



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surfing, or do not have access to their records. Providers currently assist their clients to meet the Department's current citizenship verification. Instituting further citizenship verification processes would be a potential barrier to access to treatment.

Similarly, requiring NHHPP participants to produce driver's licenses or non-drivers identification cards would be an excessive burden for enrollees. Individuals seeking treatment do not always have this documentation. Failing to produce a driver's license or identification card should not be reason to impede access to healthcare services.

### Work Requirement

The NH Providers Association is in strong opposition to the work requirement described in the Amendment. Individuals accessing substance use disorder treatment may be struggling with severe and persistent behavioral health concerns. The requirement to obtain employment, particularly if an individual is only able to obtain a job that does not have paid sick leave, to a significant barrier to access to healthcare. The intent of the Medicaid program is to provide healthcare services. Instituting barriers to providing healthcare services would be in direct conflict of the objectives of the Medicaid program.

Please contact me with further questions at (603) 225-9540, ext. 113 or [Courtney@nhproviders.org](mailto:Courtney@nhproviders.org).

Sincerely,

Courtney Gray, JD/MSW  
Executive Director